

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>NICHOLAS DAVID TROUT</b>	:	<b>CASE NO. 1-19-03269-HWV</b>
<b>aka NICK D. TROUT</b>	:	
<b>DIANA ELIZABETH TROUT</b>	:	<b>CHAPTER 13</b>
<b>Debtors</b>	:	
	:	
<b>PENNYMAC LOAN SERVICES, LLC</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>NICHOLAS DAVID TROUT</b>	:	
<b>aka NICK D. TROUT</b>	:	
<b>DIANA ELIZABETH TROUT</b>	:	
<b>Respondents</b>	:	

**DEBTORS' RESPONSE TO MOTION OF  
PENNYMAC LOAN SERVICES, LLC  
FOR RELIEF FROM THE AUTOMATIC STAY**

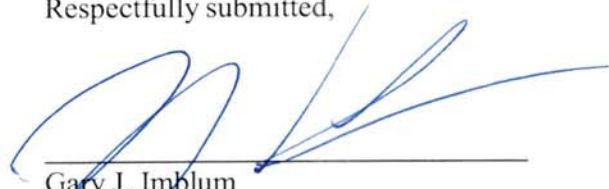
**AND NOW**, come Debtors, Nicholas David Trout and Diana Elizabeth Trout, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtors offer to cure the arrearage through an Amended Plan.

9. Admitted.

**WHEREFORE**, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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Attorney for Debtors

DATED: 11-9-20

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF PENNYMAC LOAN SERVICES, LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

REBECCA A. SOLARZ, ESQUIRE  
KML LAW GROUP, P.C.  
COUNSEL FOR MOVANT  
VIA E-SERVICE

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For Debtors

DATED: 11/9/2020